

United States District Court

for the
Western District of New York



United States of America

v.

Case No. 25-mj-5149

JERSON CASTILLO-UMANZOR

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of June 24, 2025, in the Western District of New York, the defendant did forcibly assault, resist, oppose, impede, intimidate, or interfere with an officer of the United States while engaged in or on account of the performance of official duties in violation of Title 18, United States Code, Section 111.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Andrew Brodell

Complainant's signature

Andrew Brodell
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to before me and signed telephonically.

Date: July 8, 2025

Michael J. Roemer

Judge's signature

City and State: Buffalo, New York

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

ANDREW BRODELL being duly sworn deposes and states:

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (“FBI”), and I am empowered by law to investigate and make arrests for offenses enumerated in Title 18, including 18 U.S.C. § 2113. As such, I am an “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7). I have been employed as a Special Agent of the FBI since 2025 and am currently assigned to the Buffalo Field Office, Joint Terrorism Task Force (“JTTF”). During that time, I have participated in investigations involving violent crime, drug trafficking networks, neighborhood-based street gangs, and national security matters to include international terrorism. In addition, I have had the opportunity to work with other FBI agents and other law enforcement agents and officers of varying experience levels who have also investigated these crimes in the Western District of New York. My training and investigative experience detailed herein, and the experiences of other law enforcement agents, who are participating in this investigation, serve as the basis for the opinions and conclusions set forth herein.

2. As part of my current duties, I have become involved in an investigation of a suspected violation of Title 18 United States Code, Section 111.

3. I make this affidavit in support of the annexed criminal complaint charging JERSON CASTILLO-UMANZOR, also known as Jerson Josue Castillo-Umanzar, hereinafter referred to as "CASTILLO-UMANZOR," with forcibly assaulting, resisting, opposing, impeding, intimidating, or interfering with an officer of the United States while engaged in or on account of the performance of official duties in violation of Title 18, United States Code, Section 111.

4. The statements contained in this affidavit are based upon my personal knowledge and upon information provided to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that CASTILLO-UMANZOR did knowingly violate Title 18, United States Code, Section 111.

PROBABLE CAUSE

5. On June 24, 2025, United States Border Patrol (USBP) Agents (BPA) Cockerel, O'Neil, Allen, Supervisory Border Patrol Agent (SBPA) Brandel, and Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) Agent Marshall assigned to the Targeting Unit, were conducting enforcement operations in and around the Walmart parking lot on Sheridan Drive in Amherst, New York. While in the parking lot, agents conducted record checks on a White 2020 Chevrolet Silverado displaying South Carolina license plates (referred to herein as "target pickup truck"). This vehicle returned to PETRONILO CASTILLO-BONILLA (hereinafter listed as "CASTILLO-BONILLA").

6. At approximately 7:30 P.M on Tuesday, June 24th, 2025, Agents observed two individuals exiting Walmart, walking towards the target pickup truck. One of the individuals was identified by Agents on scene as CASTILLO-BONILLA. When the two individuals were unloading a grocery cart into the target pickup truck, BPA Cockerel approached both individuals with his Border Patrol Badge worn openly around his neck asking if one of them was named "CASTILLO-BONILLA." Immediately following Agent Cockerel's encounter with these two individuals, both individuals ran in opposite directions fleeing the agents.

7. The two individuals, CASTILLO-BONILLA, and CASTILLO-UMANZOR ran directly into ICE ERO Officer Marshall and BPA O'Neill, who were wearing body armor vests with various Police markings and placards, and they began to resist their detainment. Both CASTILLO-BONILLA and CASTILLO-UMANZOR were taken to the ground and Agents attempted to place them in handcuffs. CASTILLO-UMANZOR resisted so forcefully that a third Agent needed to come to assist in his detainment. Finally, the three Agents were able to control CASTILLO-UMANZOR enough to stand him up to place him in handcuffs.

8. In the middle of the fight occurring in the parking lot, SBPA Brandel arrived in his marked vehicle. He moved in to assist the two Agents detaining CASTILLO-BONILLA, gave commands in English and in Spanish, and stated he would deploy his taser if necessary. CASTILLO-BONILLA then finally complied and was handcuffed. SBPA Brandel then noticed the three Agents detaining CASTILLO-UMANZOR were having a difficult time due to CASTILLO-UMANZOR's resistance and trained his taser on him. At this point, CASTILLO-UMANZOR saw his father (CASTILLO-BONILLA) being detained and grew

even more resistive and began to pull the three Agents attempting to handcuff him forward in an attempt to move through SBPA Brandel to his father. At this point, SBPA Brandel deployed his taser on CASTILLO-UMANZOR in order to stop his resistance and detain him.

9. WHEREFORE, I respectfully submit the foregoing facts establish probable cause to believe that on or about June 24, 2025, JERSON CASTILLO-UMANZOR did forcibly assault, resist, oppose, impede, intimidate, or interfere with an officer of the United States while engaged in or on account of the performance of official duties in violation of Title 18, United States Code, Section 111.

Andrew Brodell

ANDREW BRODELL
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed telephonically
this 8th day of July 2025.

Michael J. Roemer

HONORABLE MICHAEL J. ROEMER
United States Magistrate Judge